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August 5, 2022

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Lai Ye v. Luckin Coffee Inc. et al.*, No. 1:21-cv-02020-JPC-SN

Dear Judge Cronan:

We represent Defendant Luckin Coffee Inc. ("Luckin") in the above-referenced matter (the "Action"). With consent of Plaintiff Lai Ye (together with Luckin, the "Parties"), we write pursuant to Rule 3.B of the Court's Individual Rules and Practices in Civil Cases to respectfully request a stay of this Action until March 1, 2023, or, in the alternative, an adjournment of the served Defendants' time to respond to Plaintiff's complaint until March 1, 2023.

The Parties have recently reached an agreement to resolve all claims in this Action (the "Settlement"), which provides for dismissal of this Action upon satisfaction of certain terms of the Settlement. The Parties anticipate knowing by March 1, 2023, whether the conditions requiring dismissal of the Action have been satisfied. Accordingly, the Parties respectfully request that the Court stay this Action until March 1, 2023, or, in the alternative, adjourn the served Defendants' time to respond to the complaint from October 20, 2022 to March 1, 2023. Plaintiff joins in this request.

This is the Parties' first request to stay this Action and second consensual request seeking an extension of Defendants' time to respond to the complaint. Luckin made its first request for an extension of its time to respond to the complaint on May 5, 2022 (ECF No. 30), which the Court granted on May 6, 2022 (ECF No. 31).

Respectfully submitted,

/s/ Lawrence Portnoy  
Lawrence Portnoy

**Electronic Filing & Email**

cc: Counsel of Record (via ECF)

Given that the parties reached a settlement in principle, the Court stays this case until March 1, 2023. If Plaintiff has not filed a notice of voluntary dismissal, or the parties a stipulation of dismissal, by March 1, 2023, then the parties shall file a joint status letter by that date. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 34 and to stay this case.

SO ORDERED.

Date: August 5, 2022

New York, New York



JOHN P. CRONAN  
United States District Judge